

Audit Report

Audit of NRC's Oversight of Decommissioned Uranium Recovery Sites and Sites Undergoing Decommissioning

OIG-12-A-06

Status of Recommendations

Recommendation 1: Establish performance measures to ensure compliance with the U.S. Nuclear Regulatory Commission (NRC)-U.S. Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site Memorandum of Understandings (MOUs).

Response: Agree. The Division of Waste Management and Environmental Protection (DWMEP) will develop appropriate controls for inclusion into its internal operations plan to ensure that DWMEP fully complies with and meets its obligations under the NRC-EPA CERCLA site MOUs (i.e., Homestake and Church Rock MOUs) including any reporting and review requirements.

Target Completion Date: September 30, 2012.

Point of Contact: John Buckley, FSME/DWMEP/Reactor Decommissioning Branch.

Recommendation 2: Develop and document in inspection guidance a frequency for inspecting uranium recovery sites transferred to the U.S. Department of Energy (DOE) for long-term surveillance.

Response: Agree. DWMEP will formalize in a memorandum its current risk-informed (including frequency of site visits) approach which focuses on problematic UMTRCA sites that exhibit technical issues. This memo will be incorporated into staff's ongoing effort to develop NUREG-1757, Volume 4, *Consolidated Guidance for Reclamation and Restoration of Commercial Uranium Recovery Facilities*.

For the problematic sites, DWMEP staff will continue to periodically accompany DOE inspectors to determine the effectiveness of DOE inspections and to independently evaluate the erosion control structures, cover performance, and other technical issues including groundwater contamination. DWMEP believes this process has been an effective way to obtain the best information about higher-risk UMTRCA sites, while reviewing how DOE is addressing the problem, and confirming that NRC regulatory requirements are being met.

Enclosure

As a further enhancement, DWMEP commits to either accompany DOE inspectors or conduct its own site visit to all transferred sites at least once every 5 years. DWMEP will also develop appropriate controls for inclusion into its internal operations plan to ensure that inspection accompaniments or site visits are being performed on schedule.

Target Completion Date: September 30, 2012.

Point of Contact: Dominick Orlando, FSME/DWMEP/Special Projects Branch.